



NATIONAL GRANGE OF THE ORDER OF PATRONS OF HUSBANDRY

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December 19, 2018

Chairman Ajit Pai
Commissioner O'Rielly
Commissioner Rosenworcel
Commissioner Carr
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 18-275, Promoting Broadband Internet Access Service for Veterans

Dear Chairman Pai and Commissioners O'Rielly, Rosenworcel and Carr:

The National Grange, the nation's oldest rural advocacy organization, has filed many times at the Federal Communications Commission ("FCC") to express support for the Lifeline program and its mission to make essential communications services affordable, especially for those living in rural communities. Today we are writing to support the filings in the above referenced docket from stakeholders about how critically important affordable broadband Internet service is to rural veterans.

As you know, approximately 1.3 million veterans (12 percent of all Lifeline beneficiaries) participate in the Lifeline program. As noted in the filing from NTCA—The Rural Broadband Association (NTCA), veterans overwhelmingly come from, and return to, rural America, with approximately 24 percent of the Nation's veterans living in rural areas.

Affordable broadband is critical for veterans and their families. For example, telehealth services hold tremendous promise for rural veterans, many of whom are senior or disabled with no alternative means to access healthcare. As noted by other filers, technological advancements including monitoring devices and video conferencing have enabled healthcare providers to treat veterans in their homes and communities. Affordable communications are also important for initiatives such as suicide prevention, treatment of depression and post-traumatic stress. But veterans cannot enjoy these benefits without first having access to affordable broadband services.

Affordability can be a factor that discourages a veteran's use of broadband – in fact, more than 21 percent of veterans rely on disability benefits as a source of income. Accordingly, unless a veteran qualifies for a Lifeline service via SNAP, Medicaid or other federal eligibility programs and is able to receive data services and a handset all at no cost to the veteran, affordability could be a significant factor in a veteran's decision on broadband subscription. No-cost Lifeline offerings from wireless Lifeline providers could play a significant role in helping to lift low-income families out of poverty. It is therefore crucial for the Commission to preserve no-cost Lifeline offerings.

Additionally, we encourage the FCC to implement the National Verifier, but not in a way that would undermine rural veterans' ability to obtain and maintain their benefits. We understand USAC is implementing the National Verifier in ways that could result in an active and legitimate SNAP or Medicaid card being rejected as acceptable eligibility documentation for failure to display an expiration date, or require a homeless veteran to resolve the address error on his application form by listing the longitude and latitude of its residence using an online tool. These approaches to otherwise straight-forward problems seem questionable and fail to take into account the economic circumstances of these applicants; many are without the means to own a computer or obtain a broadband connection on their own, not to mention operating an online tool. This could needlessly impose undue burden on rural veterans and prevent those who are eligible from receiving the service, leading to serious under-enrollment. We trust that the National Verifier will reduce fraud, protect the integrity of the Lifeline program and establish sound administrative practices, but USAC must put consumers first while safeguarding universal service dollars.

Finally, we share the concerns of the Free State Foundation and others who recommend the FCC reexamine the minimum standard regulations adopted in 2016, noting that these standards could lead to the elimination of no-cost Lifeline services. We understand that mandated increases in the minimum service standard requirements could in effect diminish subsidy support (by making it more expensive to offer free Lifeline services), which likely will mean the service providers may start charging customers, making Lifeline less affordable and in turn, limit program participation.

Already, we have learned that Lifeline carriers are spending less resources advertising the availability of Lifeline services due to the escalating costs imposed by the minimum standards. Some have even left the more rural states because it has become unprofitable to provide services there, leaving rural veterans with fewer wireless options. As we have noted many times before, the free Lifeline offerings have led to more eligible people benefiting from the program. We believe that charging a consumer for Lifeline will significantly decrease enrollment and widen the digital divide.

We appreciate the opportunity to provide these comments and we look forward to working with the Commission to ensure veterans and their families have access to affordable, essential broadband services, regardless of where they live.

Sincerely,



Betsy E. Huber, President
The National Grange

¹ Statement Of Commissioner Jessica Rosenworcel, Promoting Telehealth for Low-Income Consumers, WC Docket No. 18-213, <https://docs.fcc.gov/public/attachments/FCC-18-112A1.pdf>

² Comments Of Ntca-The Rural Broadband Association Before the FCC, Promoting Broadband Internet Access, WC Docket No. 18-275 Service for Veterans, DA 18-947, October 12, 2018. https://www.ntca.org/sites/default/files/federal-filing/2018-10/10.12.18_WC_Docket_No_18-275_Veterans_telehealth_public_notice.pdf

³ Ibid.

⁴ Filing by advocates for Veterans, Docket 18-275, Promoting Broadband Internet Access, <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5bd8e900898583ab4b94016a/1540942080611/Veterans+Broadband+Internet+Access+Letter+to+FTC.Oct2018.pdf>

⁵ National Survey of Veterans, Active Duty Service Members, Demobilized National Guard and Reserve Members, Family Members, and Surviving Spouses," U.S. Department of Veterans Affairs/Westat (2010) (<https://www.va.gov/survivors/docs/nvssurveyfinalweightedreport.pdf>)

⁶ <http://freestatefoundation.blogspot.com/2018/11/veterans-day-2018.html>